

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

**IN RE: CHANGE HEALTHCARE, INC.
CUSTOMER DATA SECURITY
BREACH LITIGATION**

*This Document Relates To All Individual
Actions*

Case No. 24-md-3108 (DWF/DJF)

**DEFENDANTS' MOTION TO
DISMISS CONSOLIDATED CLASS
ACTION COMPLAINT –
INDIVIDUAL TRACK**

Defendants in the above-entitled action, by and through their undersigned counsel, hereby move to dismiss the claims asserted against them by Plaintiffs in the Consolidated Class Action Complaint brought in the Individual Track, *Christenson v. UnitedHealth Grp. Inc.*, Case No. 25-cv-183 (D. Minn), Dkt. 1, for all the reasons set forth in the accompanying memorandum of law and the Choice of Law memorandum.

This motion is supported by all files, records, and proceedings herein, as well as the accompanying memorandum of law, appendices, exhibits, and Choice of Law memorandum. A proposed order also accompanies this motion.

Respectfully submitted,

Dated: March 21, 2025

/s/ Allison M. Ryan

Allison M. Ryan
Alicia J. Paller (MN No. 0397780)
Joseph J. Cavanaugh
HOGAN LOVELLS US LLP
555 13th Street NW
Washington, DC 20004
Tel: (202) 637-5600
Fax: (202) 637-5910
allison.holt-ryan@hoganlovells.com
alicia.paller@hoganlovells.com
joe.cavanaugh@hoganlovells.com

/s/ Peter H. Walsh

Peter H. Walsh (MN No. 0388672)
HOGAN LOVELLS US LLP
80 South Eighth Street, Suite 1225
Minneapolis, MN 55402
Tel: (612) 402-3017
Fax: (612) 339-5167
peter.walsh@hoganlovells.com

Vassi Iliadis
HOGAN LOVELLS US LLP
1999 Avenue of the Stars, Suite 1400
Los Angeles, CA 90067
Vassi.iliadis@hoganlovells.com
Tel: (310) 785-4727
Fax: (310) 785-4601

Attorneys for Defendants